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8	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
9	BANK OF AMERICA, N.A.,	Case No.: 2:21-cv-00584-KJD-NJK	
10 11	Plaintiff, vs.	STIPULATION TO CONTINUE STAY OF CASE	
12			
13	NORTH AMERICAN TITLE INSURANCE COMPANY,	(FIRST REQUEST)	
14	Defendants.		
15			
16	Plaintiff, Bank of America, N.A. ("BA	ANA") and Defendant, North American Title	
17	Insurance Company ("NATIC" and collectively with BANA, the "Parties"), by and through their		
18	respective undersigned counsel, hereby stipulate and agree as follows:		
19	WHEREAS, on April 8, 2021, BANA filed its Complaint in the Eighth Judicial District		
20	Court, Case No. A-21-832600-C [ECF No. 1-1];		
21	WHEREAS, on April 9, 2021, NATIC filed a Petition for Removal to this Court [EC.		
22	No. 1];		
23	WHEREAS, on April 14, 2021, the Parties entered into a Stipulation to Stay Case an		
24	advised the Court the Parties saw potential for settling this matter and agreed to file a status repo		
25	in 90 days [ECF No. 6];		
26	WHEREAS, on April 15, 2021, this Court entered its Order on the Stipulation to Sta		
27	Case [ECF No. 7];		
28	WHEREAS, on July 14, 2021, the Parties filed their Joint Status Report in which BANA		

1	advised it was preparing a formal settlement demand and the Parties anticipated placing the matter		
2	in mediation. However, the Parties requested an additional 60 days to pursue settlement [ECF No.		
3	9];		
4	WHEREAS, due to the request of a 60 day extension, on August 4, 2021, the Clerk of the		
5	Court entered a Notice instructing the Parties to refile the Joint Status Report as a Stipulation for		
6	Extension of Time using the same pdf image [ECF No. 10];		
7	WHEREAS , on August 5, 2021, the Parties refiled the Joint Status Report using the same		
8	pdf image as a Stipulation for Extension of Time pursuant to the Clerk's Notice [ECF No. 11];		
9	WHEREAS, on October 13, 2021, the Clerk of the Court entered another Notice advising		
10	the Parties the document's title should have been changed a proposed order should have been		
11	added [ECF No. 13];		
12	WHEREAS, on March 14, 2022, because the parties had not corrected the issues noted in		
13	ECF No. 13, the Court entered a Minute Order denying the Parties' 60 day extension and requiring		
14	the Parties to show cause why this case should not be dismissed by March 21, 2022 [ECF No. 14]:		
15	WHEREAS, on March 17, 2022, the Parties filed a Joint Response to the Court's Minute		
16	Order and advised they desire to continue good faith settlement negotiations and believe that this		
17	matter should remain stayed [ECF No. 15];		
18	WHEREAS, BANA has submitted a settlement demand to NATIC and the Parties are		
19	considering whether a mediation would be appropriate;		
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1	NOW THEREFORE, BANA and NATIC hereby STIPULATE and AGREE as follows	
2	subject to the approval of the District Court:	
3	1. The action shall remain STAYED.	
4	2. The Parties shall file with the Court with a Joint Status Report ninety (90) days after	
5	entry of the order on this stipulation and every ninety (90) days thereafter.	
6	3. In the event the Parties are not able to settle, the Parties will submit a proposed	
7	scheduling order to the Court.	
8	DATED this 21st day of March, 2022.	DATED this 21st day of March, 2022.
9	WRIGHT, FINLAY & ZAK, LLP	SINCLAIR BRAUN LLP
10		
11	/s/ Lindsay D. Dragon, Esq. Lindsay D. Dragon, Esq. Nevada Bar No. 13474 7785 W. Sahara Ave., Suite 200 Las Vegas, Nevada 89117 Attorneys for Plaintiff, Bank of America, N.A. as Successor by Merger to BAC Home Loans Servicing, LP	/s/ Kevin S. Sinclair, Esq.
12		Kevin S. Sinclair, Esq. Nevada Bar No. 12277
13		16501 Ventura Blvd, Suite 400 Encino, California 91436
14		Attorneys for Defendant, North American Title Insurance Company
15		
16		
17	IT IS SO ORDERED.	
18	Dated this 23rd day of March, 2022.	
19 20	Dated this <u>251d</u> day of Watch, 2022.	
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$\begin{bmatrix} 21 \\ 22 \end{bmatrix}$	UNITED STATES DISTRICT JUDGE	
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